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MEMO ENDORSED

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July 10, 2020

BY ECF

Honorable Kenneth M. Karas
United States District Judge
United State District Court
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Jeffrey Crossland, et al.*, 19 Cr. 645

Dear Judge Karas:

We represent defendant Jeffrey Crossland in the above-captioned matter. With Susanne Brody, Esq., counsel for defendant Raymond Robinson, we write to request a two-month adjournment of the status conference presently scheduled for July 16, 2020. The government does not consent to an adjournment beyond thirty-days without a motion schedule.

The parties last appeared before the Court for a status conference on April 24, 2020. At that time, we advised the Court that the government's discovery includes 33,666 emails requiring the use of an e-discovery management program which, after much searching and pricing, had only recently been set up through the Defender Services' Office. The program's developer, however, could not provide us with the necessary training until the end of May.

Although the technical obstacles have been cleared, the volume of discovery – nearly 48,000 documents and 284 consensually recorded calls – is formidable, and the circumstances of the COVID-19 pandemic have presented other personal and professional challenges. We have thus not been able to review enough material to date to be able to assess potential pretrial motions and contemplate a motion schedule. We believe that we will be in a position to do so at a mid-September status conference.

LAW OFFICES OF SUSAN C. WOLFE
Hon. Kenneth M. Karas
July 10, 2020
Page 2

Thank you for you consideration.

Respectfully submitted,

s/

Susan C. Wolfe
Diane M. Fischer

Counsel for Jeffrey Crossland

BY ECF
All Counsel of Record

*Granted. The Court will hold a
status conference on 9/22/2020 at
10:30 AM. Time is excluded until 9/22/20
under the Speedy Trial Act, 18 U.S.C. §
3161(h)(7)(A), in the interests of justice.*

SO ORDERED


KENNETH M. KARAS U.S.D.J.

7/13/2020